

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

**CONCORD MANAGEMENT AND
CONSULTING LLC,**

Defendant.

Crim. No. 18-CR-32-2 (DLF)

FILED UNDER SEAL

PARTIES' JOINT MOTION FOR LEAVE TO FILE UNDER SEAL

Defendant Concord Management and Consulting, LLC (“Defendant” or “Concord”) and the United States (collectively, the “Parties”), by and through counsel, jointly move for leave of the Court to file the attached pleading and its attached Exhibits A-H under seal. The pleading and exhibits contains references to contents and proposals for handling sensitive discovery materials, sensitive law enforcement techniques, and other materials that the Parties propose should be redacted from public filings.

Respectfully submitted,

JOHN C. DEMERS
Assistant Attorney General for National Security

JESSIE K. LIU
United States Attorney

By: _____/s/
Heather N. Alpino
U.S. Department of Justice
National Security Division
950 Pennsylvania Ave. NW
Washington, D.C. 20530
Telephone: (202) 514-2000

By: _____/s/
Jonathan Kravis
Deborah Curtis
Kathryn Rakoczy
555 Fourth Street NW
Washington, D.C. 20530
Telephone: (202) 252-6886

CERTIFICATE OF SERVICE

I hereby certify that on August 9, 2019, I caused a copy of the foregoing motion to seal to be transmitted to Katherine Seikaly and Eric Dubelier, counsel of record for Concord Management and Consulting LLC, via email.

By: _____/s/
Kathryn L. Rakoczy
Assistant United States Attorney
555 Fourth Street NW
Washington D.C. 20530

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ORDER

Upon consideration of the Parties' joint motion for leave to file under seal, it is hereby
ORDERED that the parties' motion is GRANTED IN PART AND DENIED IN PART,
and,

IT IS FURTHER ORDERED that, this Order, the Parties Motion to Seal [Dkt. No. 168],
and the Text of Proposed Sealing Order [Dkt. No. 168-10] shall be publicly filed on the docket;
however,

IT IS FURTHER ORDERED that the Parties Joint Filing Regarding Modified Proposed
Redactions to Pleadings and Transcripts Relating to Modification of the Protective Order [Dkt.
No. 168-1] and the attached Exhibits A-H (Parties' Proposed Redactions) [Dkt. Nos. 168-2
through 168-9] will remain under seal.

Date: August ____, 2019

The Honorable Dabney L. Friedrich
United States District Judge